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Lee A. Norman, M.D., Secretary

Laura Kelly, Governor

January 6, 2021

Elizabeth Hagenmaier
U.S. EPA, Region 7
11201 Renner Blvd
Lenexa, KS 66219

SUBJECT: KDHE comments for the draft *Technical Memorandum OU8 Mine Waste Disposal Options Evaluation Cherokee County Superfund Site Baxter Springs and Treece Subsites OUs 3, 4, and 8 Cherokee County Kansas*

Dear Ms. Hagenmaier:

Per the Environmental Protection Agency Region 7 (EPA) request the Kansas Department of Health and Environment (KDHE) reviewed the referenced subject document. The memo evaluates potential mine waste disposal sites to support the remedial design final phase.

The memo purpose is to evaluate six mine waste disposal location options to support remedial design final phase including implementing the Operable Unit (OU) 8 remedy. The disposal evaluation considered four aspects: 1) Location and physical capacity; 2) Haul distance, road safety, and transportation cost; 3) Waste emplacement increasing repository height or side slope steepness to unmanageable levels or footprint floodplain encroachment; and 4) Property access and property owner willingness to allow off-site waste importation and disposal.

Based on these considerations, the recommended disposal location is the OU5 Subsite near the City of Galena. It provides the greatest advantage considering suitable physical disposal area and transportation distance. EPA recognizes potential city concerns about increased traffic. EPA surmises amelioration through rectifying potential partially remediated status through potential beneficial use by converting existing barren site into higher quality through establishing vegetative cover and covering remaining contamination.

KDHE does not have any substantive comments regarding the draft disposal memo. The OU5 area seems a good balance between cost and physical site requirements.

Thank you for giving KDHE the opportunity to review and comment. If you have any comments or questions, feel free to contact me at chris.hase@ks.gov or (785) 296-2866.

Sincerely,

 Recoverable Signature

X Chris Hase

Chris Hase
Project Manager
Signed by: a5f2a0a2-a650-4a42-80fa-eb6c2d9403b6

Chris Hase
Project Manager

cc: File: C3-011-73152 (1)